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TN REGULATORY AUTHORITY
TELECOMMUNICATIONS DIVISION

Ms. Lisa Foust
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

Re Docket Number 05-00147 – Pre-filed Testimony of Ed Ariel (“PFT #1”) replaced with Pre-filed Testimony of Cameron Nance (“PFT #2”)

Dear Ms Foust

Transmitted herewith on behalf of Trans National Communications International, Inc (“TNCI”), please find PFT #2 for inclusion in Docket Number 05-00147. On May 16, 2005, TNCI submitted PFT #1 to the Tennessee Regulatory Authority (“TRA”) as part of the Company’s application for authority to provide local exchange services within the state of Tennessee (Federal Express Tracking Number 8511 7574 8394). Unfortunately, as important information contained in PFT #1 has substantially changed, TNCI respectfully seeks the TRA’s permission to withdraw PFT #1 from Docket 05-00147 and in its stead substitute PFT #2. Please note that PFT #2 contains the most up-to-date information about TNCI.

Please note the following important changes between PFT #1 and PFT #2.

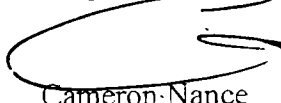
- Mr Ed Ariel, author of PFT #1 no longer serves in the capacity of TNCI’s Director of Regulatory Affairs. The position is presently unfilled; however, Cameron Nance, author of PFT #2, represents the next level of authority within TNCI’s regulatory department.
- Mr Phil Josephson was listed in PFT #1 as TNCI’s Vice President and General Counsel, however, Mr Josephson is no longer employed at TNCI.
- PFT #1’s Exhibit F has been removed from PFT #2 because on July 18, 2005, TNCI responded to an additional data request from the TRA in this matter and provided more recent financial information than was contained in Exhibit F of PFT #1.
- PFT #2 includes a section that lists the states where TNCI has operational authority, including those states where such authority is pending.

Ms Lisa Foust – TRA
Pre-filed Testimony of Cameron Nance O/B/O TNCI – Docket Number 05-00147

- Contained in Appendix A of PFT #2 TNCI details how it will respond to TRA inquiries

TNCI sincerely appreciates your time and attention to this matter. Please direct any questions regarding this filing to the undersigned at (617) 369-1163 or via e-mail at cnance@tnci.com

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'Cameron Nance', written over a horizontal line.

Cameron Nance
Regulatory Affairs Department

Enclosure Pre-filed testimony of Cameron Nance – Docket Number 05-00147
cc File

**IN THE MATTER OF THE §
APPLICATION OF TRANS §
NATIONAL COMMUNICATIONS §
INTERNATIONAL, INC. FOR A §
CERTIFICATE TO PROVIDE §
COMPETING LOCAL EXCHANGE §
TELECOMMUNICATIONS SERVICES §**

PRE-FILED TESTIMONY OF CAMERON NANCE

Q: Please state your name, business address and position.

Q: Please briefly describe your duties.

My professional duties include oversight of federal and state regulatory and governmental affairs for TNCI. As such, I am directly tasked with ensuring enterprise-wide compliance with laws, rules, and orders. Moreover, I am responsible for meeting TNCI's various reporting obligations and resolving consumer complaints arising from the FCC, state Commissions, state Attorneys General and Better Business Bureaus. Further, I am responsible for authoring TNCI's interexchange and local exchange service tariff filings, monitoring

industry-impacting legislation and court rulings, and championing TNCI's interests at various public/private sector linkages such as Commission docket proceedings

Q: Please describe your experience and educational background.

A: My professional background includes seven (7) years of telecommunications experience in progressively responsible craft and management positions at GTE, Verizon, VarTec, Excel and TNCI. I have directly represented dominant and non-dominant provider interests in areas such as local exchange, long distance, calling card, high-speed data and Internet services. My educational background includes a bachelor's degree in political science from Texas A&M University (Commerce, TX) and a master's degree in public administration from the University of North Texas (Denton, TX).

Q: What is the purpose of your testimony?

A: To represent TNCI's managerial, financial and technical qualifications to the Tennessee Regulatory Authority ("TRA") and to respectfully request that the TRA enter an Order granting TNCI's petition for authority to provide local exchange services within the state of Tennessee.

Q: Are all statements in TNCI's Application true and correct to the best of your knowledge, information and belief?

A: Yes

Q: Please describe the current corporate structure of TNCI.

A: TNCI is a privately held corporation that was incorporated within the state of Delaware on August 1, 1995 for the purpose of providing integrated

telecommunications services to consumers throughout the United States. The corporate structure of TNCI is comprised of a very well qualified senior management team including the founder of TNCI, Mr STEVE BELKIN who earned an undergraduate engineering degree from Cornell University (Ithaca, NY) and a master's degree in business administration from Harvard University (Cambridge, MA). The organizational hierarchy of TNCI is logically structured with responsibility for day-to-day operations residing with the Applicant's president, Mr BRIAN TWOMEY. Mr TWOMEY earned a bachelor's degree in Accounting and Finance from Merrimack College (Andover, MA) and a master's degree in business administration from the University of New Hampshire (Durham, NH). TNCI benefits from Mr TWOMEY's extensive leadership experience gained at such notable telecommunications companies as NYNEX, AT&T, Sprint and McCaw Cellular Communications. Subsequent levels within the organization's hierarchy focus on service operations (including provisioning, billing and product development), finance, human resources, information technology, marketing, customer service and as noted, regulatory/governmental affairs. Additional key leaders include Senior Vice President of Operations, Mr CHUCK LUCA, Vice President of Finance and TNCI's Controller, Ms PAMELA HESSE, Vice President of Product Development, Ms BRENDA MCDONALD, and Directors of Human Resources, and Risk Management, Ms KIMBERLY NOLAN and Mr ED ARIEL, respectively. Please note that each member of the Applicant's senior leadership has extensive and diverse telecommunications industry experience, with many holding undergraduate and

advanced degrees. As such, TNCI's corporate structure is characterized by a clearly defined organizational hierarchy designed to make the Company efficient and accountable in its provisioning of long distance and local exchange telecommunication services.

TNCI has obtained operational authority to provide long distance services in each state, including Alaska and Hawaii and the District of Columbia. Further, the Applicant has obtained authority to provide local exchange service in the following thirty-eight (38) jurisdictions: Alabama, Arizona, California, Connecticut, District of Columbia, Florida, Georgia, Iowa, Idaho, Illinois, Indiana, Kansas, Kentucky, Massachusetts, Maryland, Maine, Michigan, Minnesota, Missouri, Mississippi, Montana, North Dakota, New Hampshire, New Jersey, Nebraska, Nevada, New York, Ohio, Oregon, Pennsylvania, Rhode Island, South Carolina, Texas, Utah, Virginia, Washington, Wisconsin, and Wyoming. TNCI has applications for authority to provide local exchange telecommunication services pending before each of the following ten (10) state utility commissions: Tennessee, Oklahoma, Arkansas, North Carolina, West Virginia, Louisiana, Delaware, New Mexico, Vermont, and South Dakota. Please note that presently, TNCI does not plan to seek local exchange service operational authority within the states of Hawaii or Alaska. Finally, the Applicant plans to submit an application for authority to provide local exchange services in the state of Colorado during 4th Quarter 2005.

Q: Does TNCI possess the requisite managerial, financial and technical abilities to provide the telecommunications services for which it has applied?

A Yes

Q: Please describe TNCI's financial qualifications.

A In an effort to demonstrate the financial soundness of TNCI, the Applicant included its most recent audited financial statements as part of TNCI's original application to the TRA for a *Certificate of Convenience and Necessity* for local exchange service authority. Based on those data, the Applicant herein affirms it possesses the required financial strength to operate within the state of Tennessee.

Q: Please describe TNCI's managerial qualifications.

A As noted in a previous response (pgs 2-4, supra), the management team at TNCI is comprised of well qualified professionals with extensive knowledge, skills and abilities in the areas of local exchange, long distance, wireless, and high-speed data telecommunications. TNCI's employees, as a group, are highly experienced and educated, many holding undergraduate and advanced degrees, and all of whom continue to receive industry training as part of their employment at TNCI.

Q Please describe TNCI's technical qualifications.

A In an effort to demonstrate the technical capabilities of TNCI, the Applicant respectfully requests that the TRA take note that at present TNCI is currently providing long distance telecommunications services within each state, likewise, the Company is operational with regards to local exchange telecommunications services in the vast majority of state jurisdictions—the remainder of which should be operational by 4th Quarter 2005. As such, based on TNCI's history of

operational success, coupled with the extensive technical experience of the Company's employs, the Applicant submits it is technically qualified to provide local telecommunications services within the state of Tennessee. In sum, TNCI is very well equipped managerially, financially and technically to provide excellent service to Tennesseans, and as such the Applicant hopes the TRA will grant TNCI's application for a *Certificate of Convenience and Necessity*.

Q: What services will TNCI offer?

A: TNCI will offer a full range of integrated telecommunications services for business customers, including local exchange, long distance, toll-free, ISDN, T1, DSL, Centrex and a host of optional calling features including Call Waiting, Caller ID, Speed Dial, Call Rejection, and Call Forwarding (various options). Further, please note that TNCI will offer directory assistance and directory listing services for its Tennessee customers.

Q: Will TNCI offer services to all consumers within its service area.

A: Presently, TNCI will offer a full range of telecommunications services to commercial consumers within the state of Tennessee. Please note that the Applicant does not plan to offer residential services at this time.

Q: Where does TNCI plan to offer local exchange telecommunications services in Tennessee?

A: TNCI plans to offer competitive local and long distance telecommunications services throughout the entire state of Tennessee, pursuant to an interconnection agreement with Bellsouth.

Q: Will the granting of a *Certificate of Convenience and Necessity* to TNCI serve the public interest?

A Yes The public interest will be served by granting TNCI's application to provide local services within the state of Tennessee because TNCI will provide an additional choice for Tennesseans As such, by fostering and furthering the competitive marketplace, TNCI's presence should result in lower prices and more choices for consumers in the state of Tennessee

Q: Does TNCI intend to comply with all rules, statutes, and orders pertaining to the provision of telecommunications services in Tennessee, including those for disconnection and reconnection of service?

A Yes TNCI intends to comply with all rules, statutes, and orders pertaining to the provision of telecommunications services within the state of Tennessee, including those for disconnection and reconnection of service

Q: Has any state ever denied TNCI, or one of its affiliates, authorization to provide intrastate service?

A No, not to my knowledge.

Q: Has any state ever revoked the certification of TNCI or one of its affiliates?

A No, not to my knowledge

Q: Who is knowledgeable of TNCI's operations & serves as regulatory contact?

A Regulatory issues should be addressed to the attention of Mr CAMERON NANCE, Regulatory Affairs Specialist at

Trans National Communications International, Inc
2 Charlesgate West, Boston, Massachusetts 02215
Telephone numbers (617) 369-1163 or Toll Free 1-(800) 900-5210, ext 1163
Email at cnance@tnci.com


Q: Has TNCI ever been investigated or sanctioned by any regulatory authority for service or billing irregularities?

A No, not to my knowledge

Q: Does this conclude your testimony?

A Yes

AFFIRMED AND SIGNED in Suffolk County, Massachusetts on September 26, 2005



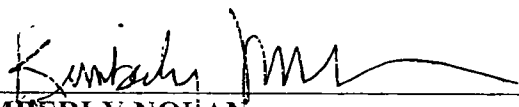
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Regulatory Affairs Specialist
Trans National Communications International, Inc
2 Charlesgate West
Boston, Massachusetts 02215
(617) 369-1163 – Office
(617) 369-1187 – Fax
cnance@tnci.com – Email

County of SUFFOLK §
§ ss.
State of MASSACHUSETTS §

THIS IS TO CERTIFY that on this 26th day of September, 2005 before me, the undersigned, KIMBERLY NOLAN, a Notary Public in and for the state of Massachusetts, personally appeared CAMERON NANCE, known to me to be the REGULATORY AFFAIRS SPECIALIST and AUTHORIZED REPRESENTATIVE for TNCI and voluntarily affirmed the information contained in the foregoing instrument is true and correct

SWORN AND SUBSCRIBED BEFORE ME THIS 26th day of September, 2005

(Seal)



KIMBERLY NOLAN
Notary Public
State of Massachusetts
My Commission Expires June 9, 2006

Appendix A

TNCI will follow this process when responding to information requests from the TRA

1. Upon receipt of an inquiry, TNCI will log the date, create a file and advise the requesting TRA Staff-person of an estimated timeframe for providing TNCI's response
2. The Company will take the appropriate internal steps to capture those data requested by the TRA. Once obtained, the information will be put in the form requested by the TRA and delivered as requested
3. In the event that the requested data does not exist or if it appears the requested information is not presently available, TNCI will so advise the TRA and commit to a timeframe for providing the information to the TRA. If requested by the TRA, TNCI will provide updates during the completion of the data request